

March 31, 2021

The Honorable Marvin L. Abney, Chair
Rhode Island House Finance Committee
State House
Providence, RI 02903

Re: National Grid's Comments to Proposed House Bill H 5204

Dear Chair Abney:

On behalf of National Grid,¹ I write to offer you and the honorable members of the committee the reasoning behind National Grid's opposition to Bill H 5204 as it pertains to the gas and electric emergency response requirements. Our concern and opposition rests on three facts:

First, that which would be required through adoption of Bill H 5204 is already included within the practices of National Grid's current emergency response plans for both gas and electric distribution. In short, National Grid's emergency response plan in Massachusetts and Rhode Island very nearly mirror one another.

Second, the Bill H 5204 requirement that the plan be shared with the pertinent regulatory agencies are already in the possession of those Rhode Island agencies. Those plans are both extensive and comprehensive. National Grid is perfectly willing to discuss any potential ways to improve those plans with the regulatory agencies as we see our emergency plans as "living documents".

Finally, we take strong exception to the potential increases in fines levied against National Grid that are included in Bill H 5204. We are exceptionally proud of the work and tireless efforts of all of our employees and outside contractors who respond wholeheartedly whenever there is an outage, large or small. Our responsibility is to ensure that we have outstanding personnel responding to such emergency. What we cannot and do not control is the ferocity of a certain weather emergency and the conditions outside of our control that might cause some of the damage that we have experienced during the last 10 years. We believe it is accurate to describe major weather events during this period as much more severe and frequent than we had ever seen before.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

National Grid's Comments on Bill H 5204

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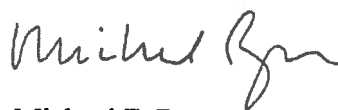
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We are proud of our response to those emergencies. We work hard to ensure that we communicate effectively with impacted cities/towns/state officials and more importantly, with each and every impacted customer. We also believe that with each emergency, weather or otherwise, there is something we can learn from each and every storm event. We work hard to ensure that our response to the next storm/weather event is always at least equal to or better than the response to the previous storm.

National Grid respectfully requests that you consider these comments when reviewing the Proposed Legislation. Accordingly, while well intended, we believe Bill H 5204 is unnecessary and urge that it not move forward.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-7515.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Ryan", with a stylized flourish at the end.

Michael F. Ryan